

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

18-CR-00108-W

ROBERT MORGAN, et al.

Defendants.

NOTICE OF MOTION FOR INTERLOCUTORY SALE OF PROPERTY

The United States of America, by and through its attorneys, James P. Kennedy, Jr., United States Attorney for the Western District of New York, Mary Clare Kane, Assistant United States Attorney, of counsel, hereby makes and files this Notice of Motion and Motion pursuant to F.R.Crim.P. 32.2(b)(7) and Rule G(7) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions (“Supplemental Rules”) and for an Interlocutory Sale of Real Property at 9000 Old Station Road, Cranberry, Pennsylvania and known as Eden Square (hereinafter “Eden Square”). In support thereof, the government offers the following Motion and the affidavit of Michael DiOrio, Executive Director of Ladder Capital Finance LLC and all other pleadings and proceedings that have previously been made a part of this prosecution.

The government requests that it be allowed to file a Reply to any opposition papers filed in response to this motion. In addition, pursuant to Local Rule 12(f), a motion for an expedited hearing on this matter is also requested.

DATED: Buffalo, New York, July 8, 2019.

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